Reply to Comments on the E-rate Program

State Library of Iowa

The State Library of Iowa strongly supports the recommendations of the American Library Association filed October 18, 2005. The ALA's in-depth comments on how to simplify the e-rate program while maintaining accountability are rational, logical and valid. The ALA position to create a simpler application process by eliminating Forms 470, 472 and 486 is sound. Needed is a simpler, less bureaucratic process.

The State Library of Iowa, as part of its role to expand and enhance library service statewide, works with eligible libraries and helps them with the e-rate process. In the state of Iowa, a small percent of eligible libraries actually apply because of the lengthy and complicated process. The number has dropped from the first year as the process continues to get more frustrating. State Library staff feel the frustration of those attempting to complete the process. "E-rate is my least favorite task," is a common sentiment.

The time and labor necessary to complete the complicated process is an excessive burden on library staff. In rural Iowa, library staff often means one person. The flow of forms and form receipt letters is very confusing. As paperwork overlaps years, it is even more confusing trying to keep straight where libraries are in the process. Are we completing the forms for this year, or beginning forms for the future? The length of the application process and the length of time it takes for the discounts to begin add to the complexity. One simple mistake can place the library in "not funded" status.

The process is too complex and the benefits or discounts often do not outweigh the time required. Increasinly heard is the comment, "this just is not worth my time". The application is entirely too burdensome and extensive, particularly for small libraries.

The State Library of Iowa supports the ALA recommendation that the technology plans be removed from the program requirements. We also agree that technology plans are an important tool to ensure that useful and cost effective implementation of technology occurs, but is an area that is best monitored and managed at the state level. The State Library also supports the ALA recommendation to revise the way in which poverty is measured for libraries. Public libraries are required to use the total school district to calculate discounts. In Iowa, school districts may include several towns and district boundary lines run across county lines. A school "district" often does not reflect the poverty level of the library at the local level.

Public libraries are often the access point in a community to high-speed Internet. The e-rate program's intent to provide these services as more affordable for schools and libraries is a good one. However, the process required of libraries and schools has become more complicated and bureaucratic each year. Libraries begin the process, but are intimidated during the process and never complete the forms. Others are confused and think they have completed the process, only to discover they will not receive funds because they neglected some step. This can happen easily as staff changes occur. One small error can eliminate the library from the program for that year. The appeal process is not satisfactory; it is not a quick process. The e-rate program is unacceptable to most applicants because of the complexity of the program. This means the initial purpose of the program is not being met. Simplification would encourage more rural, budget-limited libraries to apply – the goal of the program. We believe the ALA recommendations will significantly improve the E-rate program and increase library participation and encourage you to implement their recommendations.

Judy Jones, Statewide E-rate Coordinator for Libraries
State Library of Iowa
1112 East Grand
Des Moines, Iowa 50319